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THE STATE OF CALIFORNIA
DEPARTMENT OF EDUCATION

CASE UNSEALED PER ORDER OF COURT

DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

February 2012 Grand Jury

12CR4352W

The grand jury charges:

INTRODUCTORY ALLEGATIONS

24 1. Citigroup, Inc. ("Citi") was a banking institution
25 headquartered in New York, New York, which provided a wide range of
26 consumer financial services, including banking services, and consumer
27 and commercial loans. Citi offered banking and Automated Teller
28 Machine ("ATM") services at thousands of locations in North America.

SPJC:lml:San Diego
10/22/12

1 Citi's deposit accounts were insured by the Federal Deposit Insurance
2 Fund.

3 2. Global Cash Access ("GCA") was a financial transaction
4 services company headquartered in Las Vegas, Nevada. It provided cash
5 access services in partnership with casinos in North America, Latin
6 America, Europe, and Asia. The cash access kiosks operated by GSA at
7 casinos allowed patrons to quickly access cash being held in their
8 personal banking accounts.

9 3. When a casino patron used their ATM card to access a GCA
10 kiosk, they would receive a check. This check operated as a "cash
11 advance" on the patron's bank account. The patron could take this
12 "cash advance" check to the casino's exchange window (i.e., "cage")
13 and cash it, minus a service fee retained by the casino.

14 4. In return for this service, GCA charged the patron a
15 percentage of the overall transaction. GSA received their "cut" from
16 the patron's ban when the transaction was reconciled - with the cash
17 advance and fees deducted from the patron's cash balance.

18 5. Morongo Casino was a casino and resort located in Cabazon,
19 California, where GCA operated one or more kiosks.

20 6. San Manuel Indian Casino was a casino located in Highland,
21 California, where GCA operated one or more kiosks.

22 7. Harrah's Casino in Laughlin, Nevada ("Harrah's Casino") was
23 a casino located in Laughlin, Nevada, where GCA operated one or more
24 kiosks.

25 8. Pechanga Resort and Casino was a casino in Temecula,
26 California, where GCA operated one or more kiosks.

27 9. Wynn Las Vegas was a casino in Las Vegas, Nevada, where GCA
28 operated one or more kiosks.

1 10. Whiskey Pete's Hotel and Casino was a casino located in
2 Primm, Nevada, where GCA operated one or more kiosks.

3 11. Spa Resort Casino was a casino located in Palm Springs,
4 California, where GCA operated one or more kiosks.

5 12. Agua Caliente Casino Resort Spa was a casino located in
6 Rancho Mirage, California, where GCA operated one or more kiosks.

7 13. Chukchansi Gold Resort and Casino was a casino located in
8 Coarsegold, California, where GCA operated one or more kiosks.

9 14. Monte Carlo Resort and Casino was a casino in Las Vegas,
10 Nevada, where GCA operated one or more kiosks.

11 15. The Bicycle Club casino was a casino in Bell Gardens,
12 California, where GCA operated one or more kiosks.

13 16. Tropicana Casino was a casino in Las Vegas, Nevada, where
14 GCA operated one or more kiosks.

Count 1

(Conspiracy - 18 USC § 371)

17 17. Paragraphs 1 through 16 are realleged as if set forth
18 herein.

18. Beginning on a date unknown to the grand jury and continuing
up to and including at least January 21, 2010, within the Southern
District of California and elsewhere, defendants ARA KESHISHYAN,
aka "Levon Grigoryan," ARA HARUTYUNYAN, ARTUR HARUTYUNYAN, VAHE
ASATRIAN, SARKIS MOOSHIDIAN, LEVON KARAMYAN, MIGRAN YAMALYAN,
aka "Mike," SERYOZHA HARUTYUNYAN, LIANNA AVETISYAN, ASHOT OGANISYAN,
OVSEP SARAFYAN, DANIEL J. THOMAS, HILDA HAKVERDYAN, ASATUR ASATRYAN,
aka "Eddi," and others, with the intent to violate the laws of the
United States, did knowingly and intentionally conspire to commit:

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1 a. Bank fraud, in violation of Title 18, United States
2 Code, Section 1344(1);

3 b. Structuring of financial transactions, in violation of
4 Title 31, United States Code, Section 5324(a)(3), and (d), Title 31,
5 United States Code, Section 5313(a), and Title 31, Code of Federal
6 Regulations, Section 1010.311.

7 Methods and Means of the Conspiracy

8 19. In furtherance of this conspiracy, the following methods and
9 means, among others, were utilized:

10 a. Defendant KESHISHYAN would recruit various members of
11 the conspiracy and direct them to open Citi checking accounts.

12 b. Each conspirator would open one or more Citi checking
13 accounts in their name.

14 c. Defendant KESHISHYAN typically caused between \$9,000
15 and \$10,000 in cash to be deposited into each Citi checking account.

16 d. The conspirators never deposited more than \$10,000 at
17 any one time in order to avoid federal financial institution
18 transaction reporting requirements.

19 e. After cash was deposited into the Citi checking
20 accounts reference above, the conspirators would go to casinos in
21 Southern California and Nevada, for the purpose of fraudulently
22 withdrawing money from those accounts.

23 f. At these casinos, the conspirators would use their Citi
24 ATM card to fraudulently obtain cash (over and above the amounts
25 deposited into their accounts) using GCA kiosks located at the
26 casinos.

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1 g. In order to obtain the cash, the conspirators exploited
2 a loophole in Citi's account security protocols, which caused Citi's
3 account reconciliation systems to treat identical, near-simultaneous
4 withdrawals as duplicates of a single withdrawal from an individual
5 Citi checking account.

6 h. In exploiting this loophole, the conspirators withdrew
7 identical sums of money in succession from a single Citi checking
8 account all within a specific time window. This allowed the
9 conspirators to fraudulently withdraw several times the amount of
10 money deposited into each account.

11 i. The conspirators sought less than \$10,000 in any one
12 cash withdrawal in order to avoid federal financial institution
13 transaction reporting requirements.

14 j. Defendant KESHISHYAN would typically collect the stolen
15 funds and then provide a cut to conspirators for their role in the
16 scheme.

17 k. The conspirators would use the stolen funds to gamble
18 at various casinos, frequently resulting in their being "comped" free
19 room and board.

20 1. Through these methods and means, the conspirators
21 obtained over \$1,000,000 in funds stolen from Citi.

Overt Acts

23 20. In furtherance of the conspiracy and to effect the objects
24 thereof, the following overt acts, among others, were committed within
25 the Southern District of California, and elsewhere:

26 a. On or about May 29, 2009, Co-conspirator "A" opened a
27 Citi account (x0136) at a Citi branch in Escondido, California.

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1 b. In or about May 2009, defendant KESHISHYAN gave
2 Co-conspirator "A" at least \$28,300 to deposit into Citi bank accounts
3 in Co-conspirator "A"'s name.

4 c. On or about May 29, 2009, Co-conspirator "A" deposited
5 \$9,300.00 into a Citi account (x8165) at a Citi branch in Escondido,
6 California.

7 d. On or about May 29, 2009, Co-conspirator "A" made two
8 \$9,255.00 withdrawals from a Citi account (x8165) using a GCA kiosk
9 at San Manuel Indian Casino, and gave some or all of this money to
10 defendant KESHISHYAN.

11 e. On or about May 30, 2009, Co-conspirator "A" deposited
12 \$9,500.00 into a Citi account (x0136) at a Citi branch in Oceanside,
13 California.

14 f. On or about May 30, 2009, Co-conspirator "A" made two
15 \$9,360.00 withdrawals from a Citi account (x8165) using a GCA kiosk
16 at Morongo Casino, and gave some or all of this money to defendant
17 KESHISHYAN.

18 g. On or about May 31, 2009, Co-conspirator "A" made three
19 \$9,360.00 withdrawals from a Citi account (x0136) using a GCA kiosk
20 at Morongo Casino, and gave some or all of this money to defendant
21 KESHISHYAN.

22 h. On or about June 4, 2009, defendant KESHISYAN deposited
23 \$6,500 into defendant ASATRIAN's Citi checking account (x1712).

24 i. On or about June 4, 2009, Co-conspirator "A" deposited
25 \$7,300 into defendant ASATRIAN's Citi checking account (x1688) at a
26 Citi branch in Carlsbad, California.

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7 1. On or about June 6, 2009, defendant SERYOZHA
8 HARUTYUNYAN made five \$9,568.00 withdrawals from his Citi account
9 (x4762) using a GCA kiosk at Morongo Casino.

10 m. On or about June 7, 2009, defendant SERYOZHA
11 HARUTYUNYAN made five \$9,360.00 withdrawals from his Citi account
12 (x4366) using a GCA kiosk at Morongo Casino.

13 n. On or about June 13, 2009, defendant ARA HARUTYUNYAN
14 made five \$9,880.00 withdrawals from his Citi account (x0438) using
15 a GCA kiosk at Morongo Casino.

16 o. On or about June 15, 2009, defendant ARA HARUTYUNYAN
17 made five \$8,994.00 withdrawals from his Citi account (x0487) using
18 a GCA kiosk at Morongo Casino.

19 p. On or about June 16, 2009, defendant KESHISHYAN caused
20 \$9,500.00 to be deposited into defendant HAKVERDYAN's Citi account
21 (x1198) at a Citi branch in San Diego, California.

22 q. On or about June 16, 2009, defendant KESHISHYAN
23 deposited \$9,200.00 into defendant HAKVERDYAN's Citi checking account
24 (x1206).

25 r. On or about June 17, 2009, defendants KESHISHYAN and
26 HAKVERDYAN made five \$9,984.00 withdrawals from defendant HAKVERDYAN's
27 Citi account (x1198) using a GCA kiosk at Morongo Casino.

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1 s. On or about June 27, 2009, defendant AVETISYAN made
2 four \$9,750.00 withdrawals from her Citi account (x0235) using a GCA
3 kiosk at Wynn Casino Casino.

4 t. On or about June 27, 2009, defendant AVETISYAN made two
5 \$9,682.00 withdrawals from her Citi account (x1316) using a GCA kiosk
6 at Whiskey Pete's casino.

7 u. On or about July 18, 2009 defendant SARAFYAN made five
8 \$9,966.75 withdrawals from his Citi account (x5765) using a GCA kiosk
9 at Bicycle Club casino.

10 v. On or about July 18, 2009 defendant SARAFYAN made five
11 \$9,350.00 withdrawals from his Citi account (x5849) using a GCA kiosk
12 at Wynn casino.

13 w. On or about July 25, 2009, defendant KESHISYAN
14 deposited \$9,500 into defendant ASATRYAN's Citi account (x5008).

15 x. On or about July 25, 2009, defendant KESHISYAN
16 deposited \$9,300 into defendant ASATRYAN's Citi account (x5040).

17 y. On or about July 25, 2009, defendant ASATRYAN made four
18 \$9,785.00 withdrawals from his Citi account (x5008) using a GCA kiosk
19 at Tropicana Casino.

20 z. On or about July 26, 2009, defendant ASATRYAN made five
21 \$9,350.00 withdrawals from his Citi account (x5040) using a GCA kiosk
22 at Wynn Casino.

23 aa. On or about July 27, 2009, defendant ASATRYAN made four
24 \$6,165.00 withdrawals from his Citi account (x5040) using a GCA kiosk
25 at the Bicycle Casino.

26 bb. On or about August 4, 2009, defendant OGANISYAN made
27 six \$9,540.00 withdrawals from his Citi account (x2256) using a GCA
28 kiosk at Pechanga Casino.

1 cc. On or about August 5, 2009, defendant OGANISYAN made
2 three \$5,350.00 withdrawals from his Citi account (x2256) using a GCA
3 kiosk at Spa Casino.

4 dd. On or about August 5, 2009, defendant OGANISYAN made
5 six \$9,630.00 withdrawals from his Citi account (x3064) using a GCA
6 kiosk at Agua Caliente Casino.

7 ee. On or about August 7, 2009, defendant KARAMYAN made
8 five \$9,540.00 withdrawals from his Citi account (x7546) using a GCA
9 kiosk at Pechanga Casino.

10 ff. On or about August 8, 2009, defendant KARAMYAN made six
11 \$9,540.00 withdrawals from his Citi account (x8577) using a GCA kiosk
12 at Pechanga Casino.

13 gg. In or about August 2009, defendant KESHISHYAN gave
14 defendant THOMAS at least \$19,650 to deposit into Citi bank accounts
15 in THOMAS's name.

16 hh. On or about August 15, 2009, defendant KESHISHYAN
17 called defendant THOMAS and instructed him to come to the Wynn Casino.

18 ii. On or about August 15, 2009, defendants THOMAS and
19 KESHISYAN made five \$9,350.00 withdrawals from THOMAS's Citi account
20 (x7904) using a GCA kiosk at Wynn Casino.

21 jj. On or about August 17, 2009, defendant KESHISHYAN
22 called defendant THOMAS and instructed him to go to Pechanga Casino.

23 kk. On or about August 17, 2009, defendants THOMAS and
24 KESHISYAN made four \$9,540.00 withdrawals from THOMAS's Citi account
25 (x7961) using a GCA kiosk at Pechanga Casino.

26 ll. On or about August 18, 2009, defendant MOOSHIDIAN made
27 five \$9,850.00 withdrawals from his Citi account (x4033) using a GCA
28 kiosk at Wynn Casino.

1 mm. On or about August 19, 2009, defendant MOOSHIDIAN made
2 five \$9,350.00 withdrawals from his Citi account (x4066) using a GCA
3 kiosk at Wynn Casino.

4 nn. On or about August 19, 2009, defendants KESHISHYAN,
5 ARTUR HARUTYUNYAN, and MOOSHIDIAN took a Southwest Airlines flight
6 from Las Vegas, Nevada, to Burbank, California.

7 oo. On or about January 5, 2010, defendant ARTUR
8 HARUTYUNYAN made ten \$4,770.00 withdrawals from his Citi account
9 (x6138) using a GCA kiosk at Chukchansi Casino.

10 pp. On or about January 11, 2010, defendant YAMALYAN made
11 twenty-eight \$4,599.99 withdrawals from his Citi account (x4889) using
12 a GCA kiosk at Harrah's Casino.

13 All in violation of Title 18, United States Code, Section 371.

14 Counts 2-15

15 (Bank Fraud - 18 USC § 1344)

16 21. Paragraphs 1 through 16 are realleged as if set forth
17 herein.

18 The Scheme to Defraud

19 22. Beginning on a date unknown to the grand jury and continuing
20 up to and including at least January 21, 2010, defendant
21 ARA KESHISYAN, aka "Levon Grigoryan," knowingly and with intent to
22 defraud, did devise and execute a scheme and artifice to defraud Citi,
23 a federally insured financial institution, as to material matters.

24 23. Paragraphs 19 and 20 of this Indictment are hereby realleged
25 as if set forth herein, and more fully describe the scheme to defraud.

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Acts in Execution of the Scheme

2 24. On or about the dates set forth (Column "A"), in the
3 Southern District of California and elsewhere, defendant
4 ARA KESHISHYAN knowingly executed and attempted to execute the
5 aforesaid scheme to defraud by causing to be issued the check
6 identified below (Column "B"), in order to obtain the money and funds
7 under the custody and control of Citi (Column "C"), from the below
8 listed accounts (Column "D"):

	"A"	"B"	"C"	"D"
Count	Date	GCA Check No.	Funds	Account
2	5/29/09	77187770	\$9,255.50	x8165
3	5/29/09	77187772	\$9,255.50	x8165
4	5/30/09	76891159	\$9,360	x8165
5	5/30/09	76891160	\$9,360	x8165
6	5/31/09	76891739	\$9,360	x0136
7	5/31/09	76891740	\$9,360	x0136
8	5/31/09	76891745	\$9,360	x0136
9	6/5/09	77192059	\$9,255.50	X1688
10	6/5/09	77192060	\$9,255.50	X1688
11	6/17/09	77631422	\$9,984	x1198
12	6/17/09	77631423	\$9,984	x1198
13	6/17/09	77631424	\$9,984	x1198
14	6/17/09	77631431	\$9,984	x1198
15	6/17/09	77631432	\$9,984	x1198

All in violation of Title 18, United States Code, Section 1344(1).

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FORFEITURE ALLEGATIONS

25. Paragraphs 1 through 24 are realleged as if set forth herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(1), 982(a)(2) and 982(b).

Forfeiture of Proceeds of Bank Fraud and Theft

6 26. Upon conviction of one or more of the offenses set forth in
7 Counts 1 through 15, in violation of Title 18, United States Code,
8 Sections 371 and 1344, defendants ARA KESHISHYAN, aka "Levon
9 Grigoryan," ARA HARUTYUNYAN, ARTUR HARUTYUNYAN, VAHE ASATRIAN, SARKIS
10 MOOSHIDIAN, LEVON KARAMYAN, MIGRAN YAMALYAN, aka "Mike," SERYOZHA
11 HARUTYUNYAN, LIANNA AVETISYAN, ASHOT OGANISYAN, OVSEP SARAFYAN, DANIEL
12 J. THOMAS, HILDA HAKVERDYAN, and ASATUR ASATRYAN, aka "Eddi," shall
13 forfeit to the United States, any property constituting or derived
14 from, proceeds traceable to such offenses, including but not limited
15 to a sum of money equal to the total amount of proceeds obtained
16 directly or indirectly as a result of the offenses.

17 27. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 18, United States Code, Section 982(b),
19 defendants ARA KESHISHYAN, aka "Levon Grigoryan," ARA HARUTYUNYAN,
20 ARTUR HARUTYUNYAN, VAHE ASATRIAN, SARKIS MOOSHIDIAN, LEVON KARAMYAN,
21 MIGRAN YAMALYAN, aka "Mike," SERYOZHA HARUTYUNYAN, LIANNA AVETISYAN,
22 ASHOT OGANISYAN, OVSEP SARAFYAN, DANIEL J. THOMAS, HILDA HAKVERDYAN,
23 and ASATUR ASATRYAN, aka "Eddi," shall forfeit substitute property,
24 up to the value of the amount described above, if, as a result of any
25 act or omission of said defendant, the property described above, or
26 any portion thereof, cannot be located upon the exercise of due
27 diligence; has been transferred, sold to, or deposited with a third
28 party; has been placed beyond the jurisdiction of this court; has been

1 substantially diminished in value; or has been commingled with other
2 property which cannot be divided without difficulty.

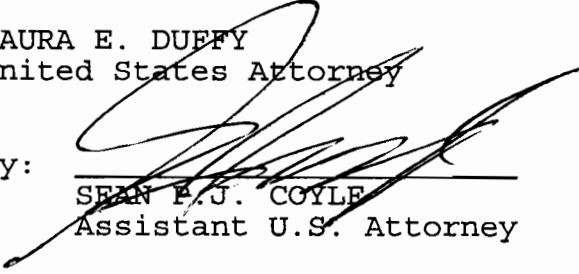
3 All pursuant to Title 18, United States Code, Sections 982(a)(2), and
4 982(b).

5 DATED: October 23, 2012.

6 A TRUE BILL:

7 
8 Neuron Lee
Foreperson

9 LAURA E. DUFFY
10 United States Attorney

11 By: 
12 Sean P.J. Coyle
13 Assistant U.S. Attorney

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